

REMARKS

Claims 1-49 were pending and presented for examination in this application. In an Office Action dated July 7, 2008, claims 1-49 were rejected. Claims 1-5, 9, and 31 are amended. Claims 1-49 are pending upon entry of this amendment. In view of the above amendments and following remarks, Applicants respectfully request that Examiner reconsider all outstanding rejections and withdraw them.

Response to Rejections Under 35 USC §103(a)

Claims 1, 3-4, 6, 12, 14, 29-32, 38, and 40

In the 3rd paragraph of the Office Action, claims 1, 3-4, 6, 12, 14, 29-32, 38 and 40 have been rejected under U.S.C. 103(a) as allegedly being unpatentable over Sugiyama (US Patent No. 5,633,723) in view of Ishikawa (US Patent No. 5,987,226). This rejection is respectfully traversed.

As amended, claim 1 recites:

A system for printing time-based media, the system comprising:

a media processing system for determining an electronic representation of the time-based media wherein the media processing system resides at least in part on a printer and at least in part on an external media processing system;

the printer including:

an interface for transferring time-based media between the external media processing system and the printer, **the interface comprising a first media interface for communicating with a first peripheral device external to the printer and a second media interface for communicating with a second peripheral device external to the printer;**

an electronic output system in communication with the media processing system to receive the electronic representation, the electronic output system producing a corresponding electronic output from the electronic representation of the time-based media; and

a resource allocation module for receiving a request for at least one media processing task and determining processing allocation for at least one media processing task among the printer and the external media processing system based on criteria.

Thus, claim 1 recites a printer that includes a “first media interface for communicating with a first peripheral device external to the printer and a second media interface for communicating with a second peripheral device external to the printer.” Multiple media interfaces for communicating with multiple peripheral devices enhances the ability of the printer to receive and process a variety of time-based media. Support for the amended claim is found throughout the specification including at paragraphs 29 and 30 and Figure 3.

Sugiyama merely describes a video printer. Sugiyama does not disclose or suggest a printer with multiple media interfaces for communicating with multiple peripheral devices that are external to the printer. In the Office Action, Examiner points to Sugiyama’s monitor driver 19 and monitor 20, and head driver 32 and thermal head 33 as allegedly representing a first interface (driver 19) for communicating with a first peripheral device (monitor 20) and a second interface (driver 32) for communicating with a second peripheral device (thermal head 33), respectively. *See* Office Action, p. 2-3. However, in the rejection of claim 1, Examiner argues that the same monitor driver (19) and monitor (20), and in the rejection of claim 3, the same head driver (32) and thermal head (33), allegedly represent part of a printed output system which is *within* the printer of Sugiyama. *See* Office Action, p. 2, 4 (respectively). It is unclear to Applicants how the monitor or the thermal head each simultaneously could be a peripheral device *external to a printer* **and** part of an output system that is *within the printer*. Applicants submit that they cannot be both.

Thus, Applicants submit that Sugiyama does not disclose or suggest at least a printer including a “first media interface for communicating with a first peripheral device external to the printer and a second media interface for communicating with a second peripheral device external to the printer.”

Ishikawa does not remedy the above-described deficiencies of Sugiyama. Ishikawa merely describes a printing system including a printer (*See* Ishikawa, FIG. 1, element 2) and a plurality of processors (*See* Ishikawa, FIG. 1, elements 1, 1', 1'' 19). However, the printer of Ishikawa does not include multiple media interfaces, nor does Examiner allege that it does. At most, Ishikawa's printer includes a single sending/receiving means (*See* Sugiyama, FIG. 1, element 4''') for communicating over a network (*See* Sugiyama, FIG. 1, element 3). Hence, Ishikawa also does not disclose or suggest at least the claimed feature of a printer including a “first media interface for communicating with a first peripheral device external to the printer and a second media interface for communicating with a second peripheral device external to the printer.”

Furthermore, Applicants submit that the combination of Sugiyama and Ishikawa also does not render obvious a printer that includes multiple media interfaces for communicating with multiple peripheral devices. The conclusion that one of skill in the art would reach based on a combination of Sugiyama and Ishikawa, or references showing any number of printers that each have, at most, a single interface, is that printers typically include only a single interface to a peripheral device. If anything, the fact that both Sugiyama and Ishikawa lack multiple interfaces is evidence that a single media interface in a printer is the standard.

For at least the reasons above, claim 1 is patentable over Sugiyama and Ishikawa, alone or in any combination. Dependent claims 3-4, 6, 12, 14, 29-32, 38 and 40 each

incorporate all the limitations of claim 1 and are patentable over the cited references for at least the same reasons.

Claims 2, 5, 7-11, 13, 15-28, 33-37, 39, and 41-49

In the 4th-15th paragraphs of the Office Action, the remaining dependent claims 2, 5, 7-11, 13, 15-28, 33-37, 39, and 41-49 have further been rejected under U.S.C. 103(a) as allegedly being unpatentable over Sugiyama and Ishikawa, further in view of “Using MPI – Portable Parallel Programming with the Message-Passing Interface, 2nd ed. (“Gropp”); U.S. Patent No. 6,167,033 (“Chang”); U.S. Patent Publication No. 2003/022098 (“Hymel”); U.S. Patent Publication No. 2002/0010641 (“Stevens”); U.S. Patent No. 6,296,693 (“McCarthy”); U.S. Patent No. 5,170,935 (“Federspiel”); U.S. Patent No. 5,940,776 (“Baron”); U.S. Patent 6,118,888 (“Chino”); U.S. Patent No. 6,308,887 (“Korman”); U.S. Patent No. 5,936,542 (“Kleinrock”); U.S. Patent No. 5,568,406 (“Gerber”); U.S. Patent No. 5,270,989 (“Kimura”); U.S. Patent No. 5,136,563 (“Takemasa”) U.S. Patent 4,734,898 (“Morinaga”); and U.S. Patent No. 6,000,030 (“Steinberg”).

The additional cited references all fail to disclose or suggest the limitations shown above to be absent from Sugiyama and Ishikawa discussed above, alone or in combination; the Examiner does not allege that they do so. Therefore, dependent claims 2, 5, 7-11, 13, 15-28, 33-37, 39, and 41-49 are patentable over all of the referenced cited above, taken alone or in any combination.

Conclusion

In sum, Applicants respectfully submit that claims 1-49, as presented herein, are patentably distinguishable over the cited references (including references cited, but not applied). Therefore, Applicants request reconsideration of the basis for the rejections to these claims and request allowance of them.

In addition, Applicants respectfully invite Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,
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Date: October 14, 2008

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